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February 26, 2025

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA	§	
VS.	§ §	CRIMINAL NO.
	§	

NATALIA FLORES, S 4:25-cr-0063

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE (Sex Trafficking of Children)

From on or about January 10, 2024, through on or about January 22, 2024, in the Southern District of Texas and elsewhere,

NATALIA FLORES,

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 1, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 1 knowing and in reckless disregard of the fact that Minor Victim 1, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).

COUNT TWO(Sex Trafficking of Children)

From on or about January 10, 2024, through on or about January 22, 2024, in the

Southern District of Texas and elsewhere,

NATALIA FLORES,

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 2, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 2 knowing and in reckless disregard of the fact that Minor Victim 2, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).

COUNT THREE (Sex Trafficking of Children)

From on or about January 10, 2024, through on or about January 22, 2024, in the Southern District of Texas and elsewhere,

NATALIA FLORES,

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 3, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 3 knowing and in reckless disregard of the fact that Minor Victim 3, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).

COUNT FOUR (Sexual Exploitation of Children)

On or about January 20, 2024, within the Southern District of Texas,

NATALIA FLORES

defendant herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor child, to wit: Minor Victim 1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transmitted using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) & (e).

(Sexual Exploitation of Children)

From on or about January 14, 2024, through on or about January 20, 2024, within the Southern District of Texas,

NATALIA FLORES

defendant herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor child, to wit: Minor Victim 2, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transmitted using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) & (e).

COUNT SIX (Sexual Exploitation of Children)

On or about January 14, 2024, within the Southern District of Texas,

NATALIA FLORES

defendant herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor child, to wit: Minor Victim 3, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transmitted using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) & (e).

COUNT SEVEN (Transportation of a Minor)

On or about January 10, 2024, within the Southern District of Texas, and elsewhere, the defendant,

NATALIA FLORES,

did knowingly transport an individual, Minor Victim 2 who had not attained the age of 18 years in interstate and foreign commerce, with intent that the individual engage in sexual activity for which any person can be charged with a criminal offense, namely, sex trafficking of a child which was a criminal offense under federal law.

In violation of Title 18, United States Code, Section 2423(a).

COUNT EIGHT (Distribution of Child Pornography)

From on or about January 14, 2024, through on or about January 20, 2024, within the Southern District of Texas,

NATALIA FLORES

defendant herein, did knowingly distribute material that contained child pornography using any means and facility of interstate and foreign commerce, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) and Section 2252A(b)(1).

NOTICE OF CRIMINAL FORFEITURE (18 U.S.C. § 1594)

Pursuant to Title 18, United States Code, Section 1594, the United States gives notice to the defendant,

NATALIA FLORES,

that in the event of conviction of the offenses alleged in Counts 1-3, as charged in this Indictment, the United States intends to seek forfeiture of:

- (a) All property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property, including, but not limited to: an Apple iPhone 12 (IMEI 355658239843762); and
- (b) All property, real or personal, that constitutes or is derived from proceeds traceable to or obtained, directly or indirectly, as a result of such offense.

NOTICE OF CRIMINAL FORFEITURE 18 U.S.C. § 2253(a)

Pursuant to Title 18, United States Code, Section 2253(a)(2) and (a)(3), the United States gives the defendant notice that in the event of conviction for the offenses charged in Counts 4-8 of the Indictment, the United States will seek to forfeit all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts 4-8; and all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in Counts 4-8 or any property traceable to such property, including, but not limited to, the following:

an Apple iPhone 13 Pro SN: MVCXWWJW2.

A True Bill:

Original Signature on File

Grand Jury Foreperson

NICHOLAS J. GANJEI United States Attorney

By: <u>Kimberly Ann Leo</u> Kimberly Ann Leo

Assistant United States Attorney 713-567-9465